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6 Attorneys for Defendant,
 7 KEY INSURANCE COMPANY

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 APRIL RECKLING, an individual and as
 assignee of GINO GIAMMANCO,

11 Plaintiff,

12 vs.

13 KEY INSURANCE COMPANY, a foreign
 corporation,

14 Defendants.

15 Case No. 2:25-cv-00161

ORDER GRANTING JOINT STATUS
REPORT RE: STAY

16 Pursuant to this Court's Minute Order of June 24, 2025 (Doc. #18), counsel for Defendant
 17 KEY INSURANCE COMPANY, Philip Goodhart, Esq. of THORNDAL ARMSTRONG, PC
 18 and counsel for Plaintiff APRIL RECKLING, Sean D. Cooney, Esq. of COONEY FORBRUSH
 19 PLLC and Jason Lather, Esq. of LATHER LAW, have met and conferred concerning how to
 20 proceed with Plaintiff's claims. During that conversation, Plaintiff's counsel indicated that their
 21 preferred course of action would be to stipulate to remand this case back to the Eighth Judicial
 22 District Court and, once done, stipulate to transfer the case to the state court in Kansas.

23 Counsel has reviewed the status of the original Eighth Judicial District Court case, Case No.
 24 A-24-908550-C which was removed to this Court, and determined that it was "statistically closed"
 25 on February 4, 2025. Counsel believes that the most efficient way to achieve their desired result
 26 would be to re-open the Eighth Judicial District Court case, and, once re-opened, remand this case
 27 back to state court. Unfortunately, this cannot be accomplished by Monday, June 30, 2025. As
 28 such, the parties jointly request that this Court allow the parties an additional fourteen (14) days to

1 accomplish the task of re-opening Eighth Judicial District Court Case No. A-24-908550-C and then
2 submitting a stipulation to remand this case back to state court.

3 This request is being made to further judicial economy and proceed as efficiently and
4 economically as possible.

5 DATED: June 27, 2025

DATED: June 27, 2025

6 CARMAN COONEY FORBUSH PLLC

THORNDAL ARMSTRONG, PC

7 /s/ *Sean D. Cooney*

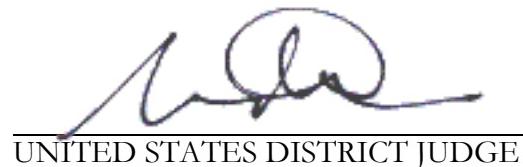
/s/ *Philip Goodhart*

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9 Nevada Bar No. 12945
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KEY INSURANCE COMPANY

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13
14 IT IS SO ORDERED.

15 DATED the 1st day of July, 2025.



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18 Submitted by:
19 THORNDAL ARMSTRONG, PC
20
21 /s/ *Philip Goodhart*
22 PHILIP GOODHART, ESQ.
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23 600 S. Las Vegas Blvd., Suite 400
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25
26
27
28

Karen M. Berk

From: Candela Orio <candela@latherlaw.com>
Sent: Friday, June 27, 2025 5:22 PM
To: Philip Goodhart; Jason Lather; Sean D. Cooney; Brittany Turner
Cc: Karen M. Berk
Subject: RE: Reckling v. Key Insurance

Phil,

Attorney Lather is now leaving his bench trial. However, he wanted me to let you know that he agrees with the 2-week request and we will figure out how to reopen the state court case to proceed with the stipulation as discussed.

Best regards,

Candela Orio
Legal Assistant
LATHER LAW
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From: "Philip Goodhart" <png@thorndal.com>
Sent: 6/27/25 4:58 PM
To: Jason Lather <jason@latherlaw.com>, "Sean D. Cooney" <seanc@cooneyforbush.com>, 'Brittany Turner' <brrittany@ccfattorneys.com>
Cc: "Karen M. Berk" <KMB@thorndal.com>, "Candela@latherlaw.com" <Candela@latherlaw.com>
Subject: RE: Reckling v. Key Insurance

Thanks Jason.

Here is a proposed Joint Status Report. Please let me know if it is acceptable and I will get it filed today. It does not have the agreed upon stipulation attached, but I hope that it is adopted as we have requested a 14 day continuance.

Also, as noted, your office will have to re-open the state court case, and I am not sure how that is accomplished.

-Phil.

Philip Goodhart | President | Thorndal Armstrong, PC

PLEASE NOTE OUR NEW ADDRESS:

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